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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13

Eric Celestine & Theresa Celestine : CASE NO. 21-17135

Debtor : HONORABLE VINCENT F. PAPALIA

**ATTORNEY'S RESPONSE TO NOTICE OF MOTION FOR RELIEF FROM
AUTOMATIC STAY**

I, Russell L. Low, Esq. hereby certify the following:

1. I, Russell L. Low, Esq. represent the debtors Eric Celestine & Theresa Celestine in this bankruptcy proceeding.
2. A Notice of Motion for Relief from Automatic Stay was entered by The Huntington National Bank.
3. The Motion for Relief states the debtors have failed to make regular monthly payments on their 2018 Honda Accord Sedan.
4. My legal team reached out to the debtors in hopes of receiving a proposal to address the arrears, however were not successful.
5. Therefore, I am respectfully requesting more time to contact the debtors and have a concrete answer on how they plan to cure their delinquency.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge.

Date: February 3, 2022

/s/ Russell L. Low
Russell L. Low, Esq.
Attorney for Debtor